

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Tomongo Bey,
Plaintiff,

v.

The Suffolk County Sheriff's Dept., Andrea }
Cabral in her Official Capacity as Sheriff }
Of Suffolk County, Officer J. Coughlin, Sgt. }
Taylor, Officer Clayton, Officer Matter, In }
Their Official and Individual Capacities, }
Defendants. }

Civil Action No. 03-12612-RCL

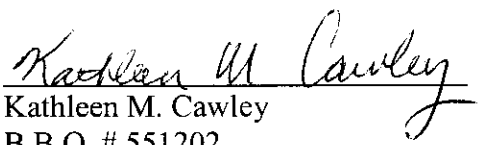
DEFENDANTS' MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12 (b)(6)

Now come Defendants, Suffolk County Sheriff's Department and Andrea Cabral, who move this Honorable Court to grant this Motion to Dismiss pursuant to FED. R. CIV. P. 12 (b)(6).

As reasons, therefore, the Defendants state that taking the allegations as true and in the light most favorable to the Plaintiff for the purposes of this motion that they are nonetheless entitled to judgment as a matter of law. In support of this Motion the Defendants have attached a Memorandum of Law.

Respectfully Submitted,
By their attorney

Date: 3/15/04


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